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January 2, 2025

Via ECF

The Honorable Jessica G.L. Clarke
United States District Judge – Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Rapaport v. Epstein, 24-cv-7439-JGLC; Rapaport v. Epstein, 23-cv-6709-JGLC (Related)

Dear Judge Clarke:

We write on behalf of Defendant Mitchell Pallaki to respectfully request that Mr. Pallaki's deadline for responding to the complaint be extended until February 13, 2025, so that it aligns with the deadline for the other defendants. Plaintiff Gideon Rapaport consents to this request.

Mr. Pallaki's current deadline for responding to the complaint is January 30, 2025. (ECF No. 12.) This is Mr. Pallaki's second request for an extension of this deadline (*see* ECF No. 11); the Court granted his prior request (*see* ECF No 12); and the parties do not have any scheduled appearances before the Court. As the Court is aware, the current deadline by which the other defendants in this action must respond to the complaint is February 13, 2025. (*See* ECF No. 22). We respectfully submit that the most efficient path forward is for all the defendants' response dates to be aligned. Accordingly, we respectfully request that Mr. Pallaki's deadline be extended to February 13, 2025 to match the other defendants' deadline.

We thank the Court for its consideration.

Respectfully submitted,

Levine Lee LLP

/s/ Steven W. Kessler

Seth L. Levine

Steven W. Kessler

cc: All Counsel of Record and *Pro Se* Plaintiff Gideon Rapaport (via ECF)